UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION AT CINCINNATI

NORMAN HUSAR, individually and on behalf of all others similarly situated,

Plaintiff,

V.

GENERAL MOTORS LLC, a Delaware limited liability company,

Defendant.

Case No. 1:21-cv-00204-MRB

Hon. Michael R. Barret

JOINT MOTION FOR EXTENDED BRIEFING SCHEDULE FOR DEFENDANT'S MOTION TO DISMISS AND STRIKE CLASS ALLEGATIONS (Doc. 15)

Plaintiff Norman Husar, individually and on behalf of all others similarly situated ("Plaintiff") and Defendant General Motors LLC ("Defendant"), through their respective counsel hereby move this Court for an entry allowing the following briefing schedule related to *Defendant's Motion to Dismiss and Strike Class Allegations* filed on May 21, 2021 (Doc. 15):

- Plaintiff, through Counsel, shall have until Monday, July 12, 2021 to file his response to
 Defendant's Motion to Dismiss;
- Defendant, through Counsel, shall have until Monday, August 16, 2021 to file its Reply in Support of its Motion.

In support of this Joint Motion the Parties state that Plaintiffs' Counsel and Co-Counsel have requested the extension as both sets of counsel have multiple one-day and multi-day trials each week during the month of June that are going forward as of the filing of this Motion. The parties also intend to use this time to engage in continued on-going communications about the possibility of settlement.

WHEREFORE the Parties jointly request this Court enter the extended briefing schedule on Defendant's Motion to Dismiss and Strike Class Allegations and for all other relief this Court may deem just and proper.

Respectfully Submitted,

By: /s/ Brian D. Flick, Esq.
Marc E. Dann (0039425)
Brian D. Flick (0081605)
Michael A. Smith, Jr. (0097147)
DannLaw
P.O. Box 6031040
Cleveland, Ohio 44103
(216) 373-0539 phone
(216) 373-0536 facsimile
notices@dannlaw.com

Thomas A. Zimmerman, Jr. (pro hac vice anticipated) tom@attorneyzim.com

Jeffrey D. Blake (pro hac vice anticipated) jeff@attorneyzim.com

ZIMMERMAN LAW OFFICES, P.C.

77 West Washington Street, Suite 1220 Chicago, Illinois 60602
(312) 440-0020 telephone
(312) 440-4180 facsimile www.attorneyzim.com

firm@attorneyzim.com

Counsel for Plaintiff and the Putative Class

/s/Kyle M. Asher (per email authority 06/01/2021)
Kyle M. Asher (0098459)
kasher@dykema.com
DYKEMA GOSSETT, PLLC
Capitol View Bldg.
201 Townsend St., Ste. 900
Lansing, MI 48933
(517) 374-9151

Russell S. Sayre (0047125) sayre@taftlaw.com Taft Stettinius & Hollister LLP 425 Walnut Street, Suite 1800 Cincinnati, Ohio 45202 Telephone: 513.381.2838 Fax: 513.381.0205

Michael J. Zbiegien Jr. (0078352) mzbiegien@taftlaw.com
Daniel H. Bryan (0095309) dbryan@taftlaw.com
Taft Stettinius & Hollister LLP
200 Public Square, Suite 3500
Cleveland, Ohio 44114-2302
Telephone: 216.241.2838
Fax: 216.241.3707

Krista L. Lenart (pro hac vice application forthcoming)
klenart@dykema.com
Dykema Gossett PLLC
2723 South State Street, Suite 400
Ann Arbor, MI 48104
Telephone: 734-214-7676

Attorneys for General Motors LLC

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2021 a copy of the foregoing was filed electronically.
Notice of this filing was sent to all counsel by operation of the Court's electronic filing system as
required by the Local Rules.

/s/Brian D. Flick, Esq.
Marc E. Dann (0039425)
Brian D. Flick (0081605)
Michael A. Smith, Jr. (0097147)
DannLaw
Co-Counsel for Plaintiff and the Putative Class